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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

CONOCOPHILLIPS ALASKA, INC., )  
)  
Plaintiff, )

v. )

FORREST WRIGHT; AMANDA WRIGHT; )  
NATHAN KEAYS; KELLY KEAYS; )  
ECO EDGE ARMORING, LLC; DAVID )  
BENEFIELD; WRIGHT CAPITAL )  
INVESTMENTS, LLC; and DB OILFIELD )  
SUPPORT SERVICES, )  
Defendants. )

**Case No. 3:19-cv-00311-SLG**

Consolidated

CONOCOPHILLIPS ALASKA, INC., )  
)  
Plaintiff, )

v. )

FORREST WRIGHT; AMANDA WRIGHT; )  
DAVID BENEFIELD; WRIGHT CAPITAL )  
INVESTMENTS, LLC; and DB OILFIELD )  
SUPPORT SERVICES, )  
Defendants. )

**Case No. 3:20-cv-00072-TMB**

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**Stipulation and Order regarding ConocoPhillips' Funds – Amanda Wright**

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## **STIPULATION AND ORDER REGARDING CONOCOPHILLIPS' FUNDS – AMANDA WRIGHT**

Plaintiff ConocoPhillips Alaska, Inc. (“ConocoPhillips”) and Defendant Amanda Wright (“Ms. Wright”) (together with ConocoPhillips, “the Parties”), hereby stipulate to the following terms and conditions:

1. Defendant Amanda Wright is an owner of Spectrum Consulting and Spectrum Residential Services, and is a managing member of Wright Capital Investments, LLC.

2. The Parties stipulate that funds improperly obtained from ConocoPhillips were deposited into the Alaska USA Federal Credit Union joint personal checking account ending in 5623. Ms. Wright disclaims any interest in said funds and does not oppose the transfer of any funds from said account to ConocoPhillips including, without limitation, in connection with its forthcoming application for default judgment against Mr. Wright, Wright Capital Investments, LLC, and DB Oilfield Support Services in this action.

3. The Parties stipulate that funds improperly obtained from ConocoPhillips were likely deposited into the Spectrum Consulting Services account at Alaska USA Federal Credit Union ending in 0183. Ms. Wright disclaims any and all interest in said funds and does not oppose the transfer of any funds from said account to ConocoPhillips including, without limitation, in connection with its forthcoming application for default judgment against Mr. Wright, Wright Capital Investments, LLC, and DB Oilfield Support Services in this action.

4. The Parties stipulate that funds improperly obtained from ConocoPhillips were deposited into the Wright Capital Investments, LLC’s account at Wells Fargo ending in 4392. Ms. Wright disclaims any and all interest in said funds and does not oppose the transfer of any funds from said account to ConocoPhillips including, without

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limitation, in connection with its forthcoming application for default judgment against Mr. Wright, Wright Capital Investments, LLC, and DB Oilfield Support Services in this action.

5. The Parties stipulate that funds improperly obtained from ConocoPhillips were used to acquire and maintain the following real properties situated in Clark County, Nevada identified in subparagraphs a. through q. (the “Nevada Real Properties”) in the name of Wright Capital Investments, LLC. Ms. Wright disclaims any interest in the Nevada Real Properties, and Ms. Wright stipulates that ConocoPhillips is entitled to a constructive trust over the Nevada Real Properties and that legal title to the Nevada Real Properties identified below should be rightfully be vested in ConocoPhillips (or its designee):

- a. Assessor’s Parcel Number (“APN”) 138-23-613-035  
6233 Espinosa Avenue  
Las Vegas, Nevada
- b. APN 138-24-115-006  
5908 W Bartlett Avenue  
Las Vegas, Nevada
- c. APN 138-25-112-019  
1524 Saylor Way  
Las Vegas, Nevada
- d. APN 138-25-114-057  
1400 Saylor Way  
Las Vegas, Nevada
- e. APN 138-25-312-008  
5824 Iris Avenue  
Las Vegas, Nevada
- f. APN 138-25-314-039  
5821 Halifax Avenue  
Las Vegas, Nevada
- g. APN 138-34-711-027  
716 Vincent Way  
Las Vegas, Nevada
- h. APN 138-34-712-050

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609 Cline Street  
Las Vegas, Nevada

- i. APN 138-35-711-036  
501 Slayton Drive  
Las Vegas, Nevada
- j. APN 138-36-120-029  
5420 Banjo Street  
Las Vegas, Nevada
- k. APN 139-08-411-011  
3602 Gold Sluice Avenue  
North Las Vegas, Nevada
- l. APN 139-19-213-079  
4609 Sawyer Avenue  
Las Vegas, Nevada
- m. APN 139-29-714-050  
2149 Sleepy Court  
Las Vegas, Nevada
- n. APN 139-30-318-007  
721 Fairway Drive  
Las Vegas, Nevada
- o. APN 140-22-314-028  
1826 Green Acres Avenue  
Las Vegas, Nevada
- p. APN 163-01-612-049  
5201 Mountain View Drive  
Las Vegas, Nevada
- q. APN 163-15-810-114  
3973 Arrowood Drive  
Las Vegas, Nevada

6. The Parties stipulate that ConocoPhillips shall have access to all monthly or periodic statements for Amanda Wright, individually or jointly, and Wright Capital Investments, LLC, Spectrum Consulting Services, Spectrum Residential, or any combination thereof. This includes, but is not limited to, information reflecting any financial transactions into or out of those accounts listed in paragraphs 2 through 4, such as, but not limited to, deposits, withdrawals, automatic payments, wire transfers, obtaining certified checks, cashiers or bank checks, etc. Ms. Wright agrees to execute

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any further releases as may be required by any such bank, credit union or financial institution for ConocoPhillips to obtain access to said account information reflecting any financial transactions into, out of, or related to those accounts, such as described above.

7. Ms. Wright further stipulates that she is not aware of any other entities or persons who claim to have an ownership or other interest in, or claim against, the funds in the accounts described in paragraphs 2 through 4 or the Nevada Real Properties described in paragraph 5, other than a certain Deed of Trust dated on or about September 10, 2019 that was recorded against two of the Nevada Real Properties.

8. Ms. Wright agrees to take any and all actions, including the execution of any and all documents, necessary to effectuate the return of the funds described in paragraphs 2 through 4 of this Stipulation to ConocoPhillips or the transfer of the Nevada Real Properties described in paragraph 5 of this Stipulation to ConocoPhillips' designee or the receiver as the Court may order, including Quitclaim Deeds, if requested. Ms. Wright further disclaims any interest in any other account or fund(s) that contains any funds that were improperly obtained from ConocoPhillips.

9. The stipulations, agreements, promises, and disclaimers made by Ms. Wright in this Stipulation are made by her both in her individual capacity and on behalf of Spectrum Consulting, Spectrum Residential Services, Wright Capital Investments, LLC and any other entity which she owns, controls or manages, including but not limited to Spectrum Consulting Services, the business entity listed on Alaska USA Federal Credit Union statements (to the extent it exists and/or Ms. Wright has any interest in it or those accounts).

10. The only account Ms. Wright has that is **NOT** to have all assets in it transferred to ConocoPhillips is at Key Bank, account ending 9317.

11. Ms. Wright does not oppose entry of Default Judgment against Defendant's Forrest Wright, Wright Capital Investments, LLC and DB Oilfield Supports Services.

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12. Nothing in this Stipulation is to be construed or inferred as an admission of liability by any Defendant, in any way, to the allegations in the Complaint. Moreover, pursuant to Federal Rule of Civil Procedure 408(a) evidence of this Stipulation and these agreements is not admissible at trial unless agreed to by all Parties.

13. Nothing about this Stipulation discharges Amanda Wright from paying any remaining balances for damages/amounts the Court Orders, or the parties through a future stipulation agree is owed to CPAI.

DELANEY WILES, INC.  
Attorneys for Conoco Phillips Alaska, Inc.

DATED: 5/1/2020

By: /s/ Timothy J. Lamb  
TIMOTHY J. LAMB  
Alaska Bar No. 8409080

NESBETT LAW OFFICE  
Attorneys for Amanda Wright

DATED: 5/1/2020

By: /s/ Michelle S. Nesbett  
MICHELLE S. NESBETT  
Alaska Bar No. 0705028

### **ORDER**

**IT IS SO ORDERED.**

\_\_\_\_\_  
HONORABLE SHARON L. GLEASON  
United States District Court Judge

DATED: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was emailed on the 1st day of May, 2020 to the following:

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